

Message

Sent: 2/21/2019 4:15:41 PM
To: Vyas, Himanshu [vyas.himanshu@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]; DeFigueiredo, Mark [DeFigueiredo.Mark@epa.gov]; Weitz, Melissa [Weitz.Melissa@epa.gov]; Waltzer, Suzanne [Waltzer.Suzanne@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]; Hoffman, Howard [hoffman.howard@epa.gov]; Gilbreath, Jan [Gilbreath.Jan@epa.gov]; Topinka, Natalie [topinka.natalie@epa.gov]; Lawrence, Rob [Lawrence.Rob@epa.gov]; Marsh, Karen [Marsh.Karen@epa.gov]; Witosky, Matthew [Witosky.Matthew@epa.gov]; Witt, Jon [Witt.Jon@epa.gov]; Garwood, Gerri [Garwood.Gerri@epa.gov]; Shapley, Ned [Shapley.Ned@epa.gov]; Miller, Elizabeth [Miller.Elizabeth@epa.gov]; Alsalam, Jameel [Alsalam.Jameel@epa.gov]; Sorrell, Virginia [Sorrell.Virginia@epa.gov]; Gregory, John [Gregory.John@epa.gov]; Kopits, Elizabeth [Kopits.Elizabeth@epa.gov]; Marten, Alex [Marten.Alex@epa.gov]; Branning, Amy [Branning.Amy@epa.gov]; Roberts, Cindy [Roberts.Cindy@epa.gov]
CC: Kaleri, Cynthia [kaleri.cynthia@epa.gov]; Eisele, Adam [Eisele.Adam@epa.gov]; Macpherson, Alex [Macpherson.Alex@epa.gov]; Marks, Matthew [Marks.Matthew@epa.gov]; Mills, Derek [Mills.Derek@epa.gov]; Bielen, David [bielen.david@epa.gov]
Subject: RE: Oil and Gas Reconsideration Workgroup Re-Start

Excerpt:

EDF Submittal to NSPS OOOOa Docket: "Low-Producing Wells are a Significant Source of Emissions; September 2016"

<https://www.regulations.gov/document?D=EPA-HQ-OAR-2010-0505-7711>

Boulder County Voluntary Oil and Gas Inspection Program (2016)⁶

Boulder county officials surveyed 229 oil and gas facilities containing between 1 and 8 wells on site in Boulder County, Colorado.⁷ The survey data show that, in 2014, 83% of facilities had production levels below 15 BOED, and that these low-producing facilities were more likely to be leaking than higher producing facilities. In particular, 44% of these low-producing facilities reported leaks, compared to only 27% of high-producing facilities with leaks.

⁶IR camera inspection data obtained from Boulder County for April 2014 thru August 2016; data is on file with EDF.

⁷ This is 229 cumulative sites with some overlap and some sites surveyed only one or two years. There were 131 sites surveyed in 2014; 84 sites surveyed in 2015; and 93 sites in 2016.

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From: Vyas, Himanshu
Sent: Thursday, February 21, 2019 8:58 AM

To: Hambrick, Amy <Hambrick.Amy@epa.gov>; DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hoffman, Howard <hoffman.howard@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>; Shapley, Ned <Shapley.Ned@epa.gov>; Miller, Elizabeth <Miller.Elizabeth@epa.gov>; Alsalam, Jameel <Alsalam.Jameel@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Gregory, John <Gregory.John@epa.gov>; Kopits, Elizabeth <Kopits.Elizabeth@epa.gov>; Marten, Alex <Marten.Alex@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Roberts, Cindy <Roberts.Cindy@epa.gov>
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Subject: RE: Oil and Gas Reconsideration Workgroup Re-Start

Re: Rob Lawrence's comment about the BLM Rule, and the reasoning there provided that there was overlap in authority—at least back then.

The final BLM rule revokes almost all the air pollution requirements and BLM's Federal Register notice says it will save the industry about \$1 billion (mostly in reduced regulatory/compliance costs) over the next 10 years.

"BLM reviewed the 2016 rule and found that it considerably overlapped existing state, tribal, and federal regulations, Bernhardt said. BLM also determined that the previous administration underestimated the 2016 rule's costs. Comments on the new final rule will be accepted for 60 days following its publication in the Federal Register in the next few days.

.
The Independent Petroleum Association of America and the Denver-based Western Energy Alliance jointly expressed their approval, noting that the new rule does not usurp air-quality authority, which Congress originally granted only to the states and the US Environmental Protection Agency."

<https://www.ogj.com/articles/2018/09/blm-issues-final-oil-gas-waste-prevention-rule-with-reforms.html>

"The BLM is rescinding the 2016 rule's novel requirements pertaining to waste minimization plans, gas-capture percentages, well drilling, well completion and related operations, pneumatic controllers, pneumatic diaphragm pumps, storage vessels, and leak detection and repair (LDAR). The BLM is revising the remaining provisions of the 2016 rule in a manner that largely reflects the BLM's longstanding policies for venting and flaring that preceded the 2016 rule. With respect to the flaring of associated gas from oil wells, the BLM will defer to appropriate State or tribal regulations in determining when such flaring will be royalty-free."

https://www.blm.gov/sites/blm.gov/files/Final%20Rule%20-1004-AE53%20-%20Ready%20for%20OFR%209.18.18_508%20%281%29.pdf

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From: Hambrick, Amy
Sent: Thursday, February 21, 2019 9:51 AM
To: DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hoffman, Howard <hoffman.howard@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Vyas, Himanshu <vyas.himanshu@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>; Shapley, Ned <Shapley.Ned@epa.gov>; Miller, Elizabeth <Miller.Elizabeth@epa.gov>; Alsalam, Jameel <Alsalam.Jameel@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Gregory, John <Gregory.John@epa.gov>; Kopits, Elizabeth <Kopits.Elizabeth@epa.gov>; Marten, Alex <Marten.Alex@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Roberts, Cindy <Roberts.Cindy@epa.gov>
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Subject: Oil and Gas Reconsideration Workgroup Re-Start

AGENDA

- (1) Technical (Karen)
 - a. Public comments
 - b. Compliance reports
 - c. Schedule
 - d. Misc.
- (2) Policy (Amy)
 - a. Updated version:
https://usepa.sharepoint.com/:f/r/sites/OAR_Custom/NSPS_0000a_Reconsideration_Workgroup/Shared%20Documents/Policy%20Package?csf=1
 - b. The FAR is on the OP calendar for 3/14, 1:30 pm, call-in #919-541-4486.
 - c. Finalizing draft ICR supporting statements, cost memo, and RIA
 - d. Misc.

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Hambrick, Amy
Sent: Thursday, February 14, 2019 10:19 AM
To: DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hoffman, Howard <hoffman.howard@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Vyas, Himanshu <vyas.himanshu@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>; Shapley, Ned <Shapley.Ned@epa.gov>; Miller, Elizabeth <Miller.Elizabeth@epa.gov>; Alsalam, Jameel <Alsalam.Jameel@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Gregory, John <Gregory.John@epa.gov>; Kopits, Elizabeth <Kopits.Elizabeth@epa.gov>; Marten, Alex <Marten.Alex@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Roberts, Cindy <Roberts.Cindy@epa.gov>
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Subject: Oil and Gas Reconsideration Workgroup Re-Start

AGENDA

- (1) Technical (Karen)
 - a. Public comments
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 - c. Schedule
- (2) Policy (Amy)
 - a. Updated version:
https://usepa.sharepoint.com/:f/r/sites/OAR_Custom/NSPS_0000a_Reconsideration_Workgroup/Shared%20Documents/Policy%20Package?csf=1
 - b. The FAR is on the OP calendar for 3/14, 1:30 pm, call-in #919-541-4486.
 - c. Finalizing draft ICR supporting statements, cost memo, and RIA
 - d. Outstanding issue: how to present regulatory text?

Amy Hambrick
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From: Hambrick, Amy
Sent: Thursday, February 07, 2019 9:52 AM
To: DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hoffman, Howard <hoffman.howard@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Vyas, Himanshu <vyas.himanshu@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>; Shapley, Ned <Shapley.Ned@epa.gov>; Miller, Elizabeth <Miller.Elizabeth@epa.gov>; Alsalam, Jameel <Alsalam.Jameel@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Gregory, John <Gregory.John@epa.gov>; Kopits, Elizabeth <Kopits.Elizabeth@epa.gov>; Marten, Alex <Marten.Alex@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Roberts, Cindy <Roberts.Cindy@epa.gov>
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Subject: RE: Oil and Gas Reconsideration Workgroup Re-Start

AGENDA

- (1) Technical (Karen)
 - a. Public comments
 - b. Compliance reports
 - c. Schedule
- (2) Policy (Amy)
 - a. New version will be up on workgroup sharepoint soon
 - b. HQ is identifying any 'show-stopper' issues from OARIO comments
 - c. Finalizing draft ICR supporting statements, cost memo, and RIA
 - d. Outstanding issue: how to present regulatory text?
 - e. It is my understanding OAQPS management is wanting to go to OMB in March... so FAR (10 day) schedule?

Amy Hambrick

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From: Hambrick, Amy
Sent: Thursday, January 31, 2019 9:21 AM
To: DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hoffman, Howard <hoffman.howard@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Vyas, Himanshu <vyas.himanshu@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>; Shappley, Ned <Shappley.Ned@epa.gov>; Miller, Elizabeth <Miller.Elizabeth@epa.gov>; Alsalam, Jameel <Alsalam.Jameel@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Gregory, John <Gregory.John@epa.gov>; Kopits, Elizabeth <Kopits.Elizabeth@epa.gov>; Marten, Alex <Marten.Alex@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Roberts, Cindy <Roberts.Cindy@epa.gov>
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Subject: RE: Oil and Gas Reconsideration Workgroup Re-Start

All- I thought I was going to cancel today, but on second thought decided to move forward with our workgroup call today since a few agenda items came up. Talk soon.

AGENDA

- (1) Technical
 - a. Memory Refresher- where did we leave things prior to holidays and new year
 - b. Public comments
 - c. Compliance reports
- (2) Policy
 - a. Memory Refresher- where did we leave things prior to holidays and new year
 - b. OAR comments received today

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-----Original Appointment-----

From: Hambrick, Amy
Sent: Wednesday, April 25, 2018 4:21 PM
To: Hambrick, Amy; DeFigueiredo, Mark; Weitz, Melissa; Waltzer, Suzanne; Mia, Marcia; Hoffman, Howard; Gilbreath, Jan; Vyas, Himanshu; Topinka, Natalie; Lawrence, Rob; Beeler, Cindy; Marsh, Karen; Witosky, Matthew; Witt, Jon; Garwood, Gerri; Shappley, Ned; Miller, Elizabeth; Alsalam, Jameel; Sorrell, Virginia; Gregory, John; Kopits, Elizabeth; Marten, Alex; Branning, Amy; Roberts, Cindy
Cc: Kaleri, Cynthia; Eisele, Adam; Macpherson, Alex; Marks, Matthew; Mills, Derek; Bielen, David
Subject: Oil and Gas Reconsideration Workgroup Re-Start
When: Thursday, January 31, 2019 10:30 AM-11:30 AM (UTC-05:00) Eastern Time (US & Canada).
Where: RTP-OAQPS-E141B/RTP-OAQPS-BLDG-E; RTP-Line-541-1595/Phone-Line/RTP-Conf-Bridge

Oil and Gas Reconsideration Workgroup -- 2019

Purpose: Continue Oil and Gas Technical Reconsideration (Final) discussions and Oil and Gas Policy Review (Proposal) discussions.

AGENDA FORMAT

- (1) Technical package
- (2) Policy Review
- (3) Open Discussion

SHAREPOINT

Go to [NSPS OOOOa Reconsideration - Workgroup Site](#)

Follow this site to get updates in your newsfeed.

• ***Technical – ADP Milestones For Final***

- Tier 2
- Early Guidance - TBD
- Options Selection - TBD
- FAR- TBD
- OMB - TBD
- Signature – TBD

• ***Policy – ADP Milestones For Proposal***

- Tier 1 (2/1/2018 approval)
- Analytical Blueprint is waived (2/6/2018)
- Early Guidance (12/15/2017 materials attached)
- Options Selection (2/9/2018 materials attached)
- OAQPS requested expedited FAR, workgroup agreed to 10 day FAR (spring summer 2018)
- FAR- TBD
- OMB-TBD
- Signature- TBD